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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KELLY J. ANDERSON,
Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.

Case No. 2:17-CV-01177-RFB-GWF

JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL AND/OR REMAND

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for thirty days from November 20, 2017 to **December 20, 2017**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant was on unexpected medical leave and became behind on her caseload. Additional time is required as Counsel for Defendant has over 75 active pending matters, of which require 2+ responses to dispositive motions per week until early-January. Due to current workload demands and shortened staff, Counsel

1 needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion
2 for Summary Judgment. Defendant makes this request in good faith with no intention to unduly delay
3 the proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.
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7 Respectfully submitted,
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9 Dated: November 20, 2017

/s/ *Daniel Jones
(*as authorized by email on November 20, 2017)
DANIEL JONES
Attorney for Plaintiff

13 Dated: November 20, 2017

STEVEN W. MYHRE
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

17 By /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:
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24 DATED: 11/21/2017


HON. GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND** on the date and
5 via the method of service identified below:

6 **CM/ECF:**

7 **Daniel S. Jones**

8 Law Offices of Charles E. Binder and Harry J. Binder, LLP
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11 New York, NY 10165
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12 **Hal Taylor**

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15 Attorneys for Plaintiff

16 Respectfully submitted this 20th day of November 2017,

17
18 /s/ Tina L. Naicker
19 TINA L. NAICKER
20 Special Assistant United States Attorney
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